

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In Re Flint Water Cases,*

No. 5:16-cv-10444-JEL-MKM  
(consolidated)

Hon. Judith E. Levy

Mag. Mona K. Majzoub

*Washington, et al.,*

No.: 16-cv-11247

Plaintiffs,

v.

*State of Michigan, et al.,*

Defendants.

**CLAIMANT'S STATEMENT OF OBJECTIONS**

NOW COMES Objector AMANDA KREUYER, on behalf and herself and six minor children, who provides this written statement of Objections pursuant to the Master Settlement Agreement (ECF No. 1319-1, revised 1394-2<sup>1</sup>) Article XX to fulfill my duty as a concerned Flint resident and citizen after learning of the details and operations of different provisions of the Master Settlement Agreement (“MSA”), which I believe are unfair, unreasonable, and inadequate:

My name is Amanda G. Kreuyer. I am the mother of seven children who have also registered pursuant to the MSA. I am married to Johannes Kreuyer. Together, we have seven children. The youngest will be one year old July 29, 2021; the oldest is 20. The other ages are one, six, eight, a fourteen year old, and a seventeen year old. I am a resident of Flint, Michigan,

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<sup>1</sup> Page references will be to the Revised version of the Settlement Agreement, ECF No. 1394-2

and have been since mid-2014. Currently I am self-employed and have been since before I moved to Flint.

I object to the proposed settlement outlined in the MSA and in the “Compensation Grid” because the allocation for those who have had bone scans is unfair and gives preference to a certain number of residents for arbitrary reasons. These scans create an unfair scheme because they have not been shown to be safe, and even if so, are impossible to obtain.

The bone scans are unfair because, first, there is no transparency about how they are done, raising concerns about their safety. These concerns have been made in other objections, and have been reported in local news media. I have also learned that the scans might have been done without proper licensing or registration under the law. If true, this underscores not only the lack of transparency, but how this kind of proof of damages is of limited availability.

Second, even if shown to be safe and reliable, I object to the use of these bone scans because unfair preference has been given to clients of Napoli Shkolnik, Levy Konigsberg, and other firms in the good graces of Napoli Shkolnik. A bone scan would be the only possible way for me to qualify for the damages categories concerning lead and physical injury (categories 22–25). I did not get a blood test during the applicable time period because the priority was my children, and for a long time during the active crisis (before the switch back), we were not told to get blood tests. Once told, the emphasis was on my children.

Regarding my minor children, I got the blood lead tests as soon as I could, but I am skeptical that they will accurately show what my children’s exposure actually was. I was informed that a doctor named Lawyernce Reynolds has objected and said that blood tests are not accurate because they were likely not done within the time of actual exposure. I agree with this concern and worry that the blood lead tests are not a good gauge of exposure.

These issues show how there are fewer people who can qualify for these higher categories, something which makes up the third grounds of my objection to this proposed partial settlement. The most valuable categories for each age minor group have only two methods—blood tests or bone tests. Depending on the readings from either test, a person could get twice or 1.5 times more than someone who has a lower reading. And if a person's only means of showing exposure is a bone test but cannot get one, the highest that person can qualify for—the fifth most valuable category for any particular minor age group, Category 5 of Group X (ages 0-6), or the equivalent for the other minor tiers—an amount that is 10% of the highest compensable category, 13.33% of the second highest, 20% of the third category, and only 40% of the amount of someone who had *the lowest compensable bone scan reading*, only because he or she did not have access to the same method.

In short, some people will get much more money than others—perhaps thousands if not tens of thousands more—not because they had a more severe injury, or suffered greater damages—but because they had access to a bone lead test while others did not. It's hard to understand how this outcome can be considered fair, especially because there is no other alternative way to get a comparable test that would be consistent across claimants.

Finally, I object to the requirement that I personally sign, with a wet signature, this objection. I have six minor children who are all being home schooled because of the pandemic. That I have to travel to downtown Flint to meet in person, during a school day, simply to do something in person which could be done safely over the phone and by email and DocuSign, is incredibly burdensome in a time like this, for something that's so important.

For the foregoing reasons, I object to the proposed partial settlement, on behalf of myself and loved ones.



Amanda G. Kreuyer (DOB 5/18/84), on behalf of herself and her six minor children, F.K (DOB 7/29/20); C.K., (DOB 7/23/19); L.K., (DOB 11/7/15); O.K. (DOB 5/12/13); R.K. (DOB 5/31/06); J.K. (DOB 4/20/03).

2405 Winifred Dr.  
Flint, MI 48506  
(616) 375-2231

DATED: March 24, 2021

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<sup>1</sup> Page references will be to the Revised version of the Settlement Agreement, ECF No. 1394-2

## Stephen Monroe

**From:** Patrick Lenciotti <PLenciotti@NapoliLaw.com>  
**Sent:** Thursday, February 25, 2021 8:32 PM  
**To:** Paul Napoli; Marc Bern  
**Cc:** Hunter Shkolnik; Sophia Higbie; Stephen Monroe  
**Subject:** RE: Cease and Desist

WARNING: --External E-mail. Use caution if opening Links and Attachments--.

Sophia and Stephen - please see below.

-----Original Message-----

From: Paul Napoli <PNapoli@NSPRLaw.com>  
Sent: Thursday, February 25, 2021 9:25 PM  
To: mbern@bernlpp.com  
Cc: Patrick Lenciotti <PLenciotti@NapoliLaw.com>; Hunter Shkolnik <Hunter@NapoliLaw.com>  
Subject: Cease and Desist

Marc

Cease and desist your office from calling our office for bone lead tests. We will not be giving you the courtesy of doing any tests for you.

If you continue harass us we will report you to the authorities.

Paul

Paul Napoli  
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EXHIBIT

A

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